

**EXHIBIT A**



3. Knowledge of HARTFORD's agreements, including the terms, meaning and/or import, whether oral or written, by and between HARTFORD and any third party involved in any manner with the administration of Plaintiff's claim for benefits, including but not limited to compensation to any third party for its role in administering or processing the claim in this case.
4. Knowledge of statistics or data regarding claims paid, denied, and profitability of HARTFORD for the group long term disability benefits from the period 2002 to present.
5. Knowledge of HARTFORD's financial goals and forecasts from 2002 to present relating to its group long term disability benefits.
6. Knowledge of statistics or data regarding the number of group long term disability claims handled by the HARTFORD and/or any affiliated Third Party Administrator, and the percentage of claims paid, denied or terminated for the period from 2002 to present.
7. Knowledge of any employment contracts between Doctors utilized for purposes of reviewing Plaintiff's claim on behalf of HARTFORD or any Third Party Administrator, whether HARTFORD engaged the Doctors directly or through a Third Party.
8. Knowledge of compensation which has any bearing on performance incentives by either the HARTFORD or any Third Party Administrator.
9. Knowledge of agreements and communications relating to agreements between HARTFORD and/or Third Party Administrator that were involved in any manner with the administration or processing of Plaintiff's claim.

10. Knowledge of HARTFORD's procedures and guidelines in connection with the processing, assessing, approving and denying of group disability claims for the time period 2002 to the present.
11. Knowledge of the procedures employed by HARTFORD to ensure that claim beneficiaries such as Plaintiff receive a full and fair review of their claims for disability benefits.
12. Knowledge of the procedures employed by HARTFORD to ensure that claim beneficiaries are not subjected to procedural irregularities in the handling of their claim for disability benefits.
13. Knowledge of HARTFORD's compliance with 29 C.F.R § 2560.503-1 with respect to Plaintiff's claim.
14. Knowledge of whether HARTFORD's conflict of interest as claim payor and claim administrator influenced the claim determination of Plaintiff's claim.
15. Knowledge of the exact information considered in rendering the claim determination of Plaintiff's claim.
16. Knowledge of the completeness, accuracy and content of the claim file.
17. Knowledge of the relationship between CNA Insurance and HARTFORD.
18. Knowledge of the relationship between HARTFORD and CNA and/or MARSH & MCLENNAN COMPANIES, INC.

Dated: Garden City, New York  
October 23, 2008

By: 

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Frankel & Newfield, P.C.  
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Garden City, New York 11530

Attorneys for Plaintiff



FRANKEL & NEWFIELD, P.C.

ATTORNEYS AT LAW

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May 28, 2009

**VIA FACSIMILE (212) 482-0002**  
**AND FIRST CLASS MAIL**

Kevin Horbatiuk, Esq.  
Russo, Keane & Toner, LLP  
26 Broadway, 28th Floor  
New York, New York 10004

**Re: Testa v. Hartford (08 Civ. 816)(FB)(RER)**

Dear Mr. Horbatiuk:

In furtherance of the above matter, following is a listing of additional subject areas to be addressed in the outstanding deposition of a representative designated by Defendant, Hartford Insurance Company ("HARTFORD"), pursuant to 30(b)(6) of the Federal Rules of Civil Procedure.

1. Knowledge of the procedures employed by HARTFORD in conducting MES Credential Audits and the frequency with which these audits are conducted.
2. Knowledge of the procedures employed by HARTFORD in conducting RRS Credential Audits and the frequency with which these audits are conducted.
3. Knowledge of the data considered, documentation reviewed, and/or any analysis performed by HARTFORD during MES Credential Audits.
4. Knowledge of the data considered, documentation reviewed, and/or any analysis performed by HARTFORD during RRS Credential Audits.
5. Knowledge of the findings and results from all MES Credential Audits conducted by HARTFORD from 2003 through 2008.
6. Knowledge of the findings and results from all RRS Credential Audits conducted by HARTFORD from 2003 through 2008.
7. Knowledge of the follow-up procedures employed by HARTFORD with regard to any problems or issues identified during MES Credential Audits conducted from 2003 through 2008.



FRANKEL & NEWFIELD, P.C.

Kevin Horbatiuk

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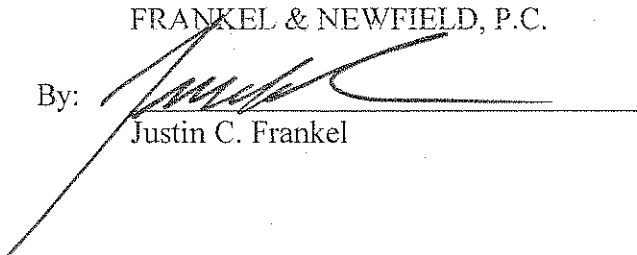
8. Knowledge of the follow-up procedures employed by HARTFORD with regard to any problems or issues identified during RRS Credential Audits conducted from 2003 through 2008.

Thank you for your attention to these matters.

Very truly yours,

FRANKEL & NEWFIELD, P.C.

By:

  
Justin C. Frankel

JCF/das

cc: Natan Hamerman, Esq.